



November 25, 2009

Jennifer J. Johnson
Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551

Via Email: comments@fdic.gov

RE: Proposed Guidance on Correspondent Concentration Risks

This letter is in response to the request for comment on the Proposed Interagency Guidance on Correspondent Concentration Risk.

Southern Bancorp Bank is a community bank comprised of \$1.1 billion in assets and is based in Arkadelphia, Arkansas. Given our size, we rely on the support and services we receive from the correspondent banking relationships we maintain with bankers banks and commercial banks that provide correspondent services. These correspondent providers are critical to our survival and fruition as they allow us to compete very effectively with larger regional and money center institutions that are in our market.

While we support the establishment of additional regulatory guidance on managing correspondent concentration risks, we are concerned over the potential for disparity in how the implied concentration limitation as a percentage of capital referenced in the proposed guidance may be interpreted by field examination staff. We recognize that credit exposures of 25% or more of capital to any one correspondent are generally considered as a concentration by the Agencies, but as Regulation F is currently written there is no limitation on exposure to any one correspondent if that institution is at least adequately capitalized. If the final guidance will contain any specific internal thresholds or benchmarks for correspondent credit exposure other than what is stated in Regulation F, we recommend that a concentration threshold be more appropriately set at 50% of a respondent bank's Tier 1 capital when the correspondent is Well Capitalized. Such a modification would appear to be in line with the perceived intent of Reg F in establishing heightened correspondent risk management measures commensurate with the financial condition of the correspondent.

We appreciate the opportunity to respond to the Proposed Interagency Guidance for Correspondent Concentration Risk and thank you for your consideration of our comments.

Sincerely,

SOUTHERN BANCORP BANK

William G. Wright, CEO Western Region

WGW/clb

601 Main Street • P.O. Box 248 Arkadelphia, AR 71923 Fax 870.246.5284 www.banksouthern.com Member FDIC

Arkadelphia
870.246.5811

Bismarck
501.865.2909

Hot Springs
501.525.1114

Malvern
501.337.4944